



DEPARTMENT OF THE ARMY
UNITED STATES ARMY CHEMICAL, BIOLOGICAL, RADIOLOGICAL,
AND NUCLEAR SCHOOL
3RD CHEMICAL BRIGADE
495 IOWA AVE
FORT LEONARD WOOD, MO 65473-8958

ATSN-CBZ

AUG 26 2013

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: COMMAND POLICY # 13, Hazard Communication / Global Harmonization System Policy

1. The purpose of this policy is to supplement Federal occupational safety and health standards contained in 29 CFR 1910.1200, Hazard Communication and AR 700-141. The 3rd Chemical Brigade Hazardous Communication / Global Harmonization System (HAZCOM / GHS) Program is established to ensure that information on all hazardous chemicals in the workplace is transmitted to affected employers and employees.

2. These procedures apply to the inventory of hazardous chemicals, labeling of hazardous chemical containers, maintenance of material safety data sheets and training required for individuals relative to hazardous chemical in the workplace.

3. Responsibilities:

a. The Battalion Commanders and Directors are responsible for the overall management of the organization's hazard communication program. Each unit/directorate must ensure a written comprehensive HAZCOM / GHS program is developed, implemented, and maintained at each level of activity; must ensure all employees who use or are exposed to hazardous chemicals receive HAZCOM / GHS training, and must ensure all employees who use or are exposed to hazardous chemicals are trained on specific hazards of each chemical.

b. The BDE S-4 and unit supply personnel are responsible for maintenance of the chemical product inventory and the receipt and maintenance of Material Safety Data Sheets / Safety Data Sheets (MSDS / SDS). The S-4 will do the following: ensure supervisors maintain MSDS / SDS for each hazardous chemical that is used or stored; ensure MSDS / SDSs are obtained from vendor for directly purchased items; ensure hazardous chemical inventory is maintained and updated monthly in each work section; ensure a copy of updated hazardous chemical material inventory is forwarded to local Safety Office and Preventive Medicine; ensure hazardous material containers are labeled in compliance with 29 CFR 1910-1200(f); ensure all employees have access to MSDS / SDSs.

c. Subordinate Commanders and unit supervisors are responsible for the following: developing, implementing and maintaining a written comprehensive hazardous communication program; ensuring all employees who use and are exposed to hazardous chemicals receive HAZCOM / GHS training; ensuring all employees who use and are exposed to hazardous chemicals are trained on specific hazards of each chemical; maintaining MSDS / SDSs for each hazardous chemical; maintaining and updating hazardous chemical material inventory; labeling, tagging and marking hazardous material containers in compliance with 29 CFR 1910.1200(f); and ensuring employees have access to MSDS/ SDSs.

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4. Chemical Inventory:

a. The BDE will strive to minimize the quantity and hazard of chemical products used by centrally managing hazardous chemical purchasing, storage and distribution, and by substituting less hazardous chemicals whenever possible.

b. A thorough chemical inventory by product name, location and approximate quantity will be completed and maintained by unit supply personnel and available for inspection at all times.

c. In addition to the organization inventory, each workplace will maintain an inventory of chemicals used or stored at that location. This inventory will be located with the applicable MSDS / SDSs.

5. Labeling Containers:

a. Chemical products used within the BDE will remain in the manufacturer's original packaging whenever possible. This ensures that the hazards are properly labeled. Should the original label be damaged to the point that the hazards can no longer be identified or should the label be missing, the container will be returned to the unit supply or BDE S-4 for identification and resolution.

b. If a chemical product must be transferred to a container other than the original manufacturer's packaging, either a label consistent with the original manufacturer's label will be affixed to the new container or the problem will be elevated to the unit supply or BDE S-4 for resolution.

6. Material Safety Data Sheets / Safety Data Sheets (MSDS / SDS):

a. Each hazardous chemical used in the BDE will have a manufacturer's MSDS / SDS on file and readily available for use and inspection. A binder, containing applicable worksite MSDS / SDSs and a copy of this policy, will be maintained by the worksite supervisors and kept on location for this purpose.

b. Individuals will have full access to these MSDS / SDSs during every work shift.

c. Should a new chemical be procured or purchased, a manufacturer's MSDS / SDS will be requested at the time of receipt of the hazardous chemical. If the MSDS / SDS is misplaced or not available, an MSDS / SDS can be obtained from the Hazardous Material Information system (HMIS) which is maintained by the BDE S-4. The chemical will not be used until an MSDS / SDS is available at the worksite and chemical specific training is conducted.

7. Hazardous Communication / Global Harmonization System Training:

a. Individuals required to use, store or transport hazardous chemicals will receive HAZCOM /GHS training to ensure that they understand the hazard communication standard, know of operations where hazardous chemicals are present, know the location of this policy, know the

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physical and health hazards of the chemicals, know what protective measures to take and know the emergency procedures.

b. Individuals requiring HAZCOM / GHS training will be trained as soon as possible after assignment to their unit and whenever a new product is introduced in the workplace or when the employee's understanding is questioned. These personnel will not be allowed to use, store or transport hazardous chemicals until the HAZCOM /GHS training has been completed.

c. HAZCOM / GHS training will be properly documented on individual training records.

d. All personnel will be trained on GHS labels and SDS format before 1 December 2013. Training records will be updated in DTMS.

8. Chemical Emergencies:

For any spill, release or emergency incident involving hazardous materials / chemicals, the fire department will be notified immediately by telephoning 911 from a land-based phone (573-596-0883 from cell phone). Any other person who receives first notification of an incident will ensure that the information is relayed to the fire department.



J.R. DRUSHAL
COL, CM
Commanding

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